

# **EXHIBIT B**

**Ng, William H.**

**FILE COPY**

**From:** Ng, William H.  
**Sent:** Friday, December 15, 2017 3:56 PM  
**To:** 'Troy Law'  
**Subject:** RE: FW: Li v. Wok 88, Inc. et al - SDNY 17-cv-08715

Mr. Schweitzer:

As we have previously advised you in our numerous emails and November 28, 2017 letter, this law firm represents Defendants Wok 88 Inc. and Ai Chiu Chiang ("Defendants") in the above-referenced action.

We are not yet required to appear in this action because the Defendants have not been served with a copy of the complaint. If you have effectuated proper service, please provide proof of the same and we will respond accordingly.

Nonetheless, we have provided you a copy of an arbitration agreement executed by your client. We would prefer to resolve this arbitration issue without unnecessary motion practice. However, if the licensed and admitted attorneys in your office are unwilling to even speak to me based on your firm's policy of "*not negotiating with parties who haven't appeared*," please advise us of the same. We will certainly advise the judge of our attempts to speak with plaintiff's counsel, as your "firm's policy" is certainly not based on any court rule or requirement and, frankly, is not based in good faith nor is it an accepted custom of practice in the federal courts of New York.

Please be advised that if we are required to engage in unnecessary motion practice, we reserve all rights and remedies as described in our November 28th letter, including, but not limited to, seeking sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure. Please be guided accordingly.

Best regards,

**William H. Ng, Attorney At Law**

Direct 631.247.4707 | Mobile 917.232.3591 | Fax 631.918.7068 | WNg@littler.com  
290 Broadhollow Road, Suite 305 | Melville, NY 11747  
900 Third Avenue | New York, NY 10022  
<https://www.littler.com/people/william-h-ng>

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**From:** Troy Law [mailto:troylaw@troypllc.com]  
**Sent:** Friday, December 15, 2017 3:17 PM  
**To:** Ng, William H.; Troy Law  
**Subject:** Re: FW: Li v. Wok 88, Inc. et al - SDNY 17-cv-08715

Mr. Ng,

My colleague advised you of our position a month ago; we have a policy of not negotiating with parties who haven't appeared.

Aaron Schweitzer

**TROY LAW**

**Attorneys & Counselors at Law**

Queens: 41-25 Kissena Blvd., Suite 119, Flushing, NY 11355 Tel: (718) 762-1324  
Taipei: 11F, No. 372, Linsen N. Rd., Taipei City 10446, Taiwan Tel: +886-2-2571-2572

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~~Our firm does not accept paper or fax correspondence, including service and production of documents, which must be sent by e-mail~~

On 13 December 2017 at 17:44, Ng, William H. <WNg@littler.com> wrote:

Counsel:

I am following up with you regarding my November 28, 2017 correspondence in the above-referenced action. I am attaching another copy of my Nov. 28th letter along with a stipulation of dismissal (without prejudice). Please advise me of your position.

Best regards,

William H. Ng, Attorney At Law

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**From:** Ng, William H.

**Sent:** Tuesday, November 28, 2017 2:22 PM

**To:** 'Troy Law'

**Subject:** RE: Li v. Wok 88, Inc. et al - SDNY 17-cv-08715

Dear Counsel:

See attached correspondence and exhibits in the above-referenced action. A copy of this letter and exhibits will be delivered to your office by overnight mail.

Best regards,

William H. Ng, Attorney At Law

Direct 631.247.4707 | Mobile 917.232.3591 | Fax 631.918.7068 | [WNg@littler.com](mailto:WNg@littler.com)

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**From:** Troy Law [<mailto:troylaw@troypllc.com>]

**Sent:** Monday, November 13, 2017 2:56 PM

**To:** Ng, William H.

**Subject:** Re: Li v. Wok 88, Inc. et al - SDNY 17-cv-08715

**TROY LAW**

*Attorneys & Counselors at Law*

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On 13 November 2017 at 14:45, Ng, William H. <[WNg@littler.com](mailto:WNg@littler.com)> wrote:

I'd appreciate the courtesy of a return call.

William H. Ng, Attorney At Law

Direct 631.247.4707 | Mobile 917.232.3591 | Fax 631.918.7068 | [WNg@littler.com](mailto:WNg@littler.com)

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**From:** Troy Law [<mailto:troylaw@troypllc.com>]

**Sent:** Monday, November 13, 2017 2:40 PM

**To:** Ng, William H.

**Subject:** Re: Li v. Wok 88, Inc. et al - SDNY 17-cv-8715

Please ecf your notice of appearance. We shall start it from there.

LLee

Leon Lee

**TROY LAW**

*Attorneys & Counselors at Law*

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On 13 November 2017 at 14:20, Ng, William H. <[WNg@littler.com](mailto:WNg@littler.com)> wrote:

Mr. Troy:

I left a message for you this afternoon regarding the above-referenced case. Please give me a call back at 631-247-4707 so we can discuss this matter.



Thanks,

William H. Ng, Attorney At Law

Direct [631.247.4707](tel:631.247.4707) | Mobile [917.232.3591](tel:917.232.3591) | Fax [631.918.7068](tel:631.918.7068) | [WNg@littler.com](mailto:WNg@littler.com)

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